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Sanyo Consumer Electronics Co., Ltd.
[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

CASE NO. 3:11-cv-03763-SI
MDL NO. 3:07-md-1827-SI

This Document Relates to Individual
Case No. 3:11-cv-03763-SI

INTERBOND CORPORATION OF
AMERICA,

Plaintiff,

vs.

AU OPTRONICS CORPORATION, *et al.*,

Defendants.

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING FURTHER
DEPOSITIONS**

STIPULATION REGARDING FURTHER DEPOSITIONS

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, Plaintiff Interbond Corporation of America (Brandsmart) and its subsidiaries ("Plaintiff"), on the one hand, and defendants in the above-captioned action ("Defendants"), on the other hand (each a "Party" and collectively, the "Parties"), as follows:

1. To the extent a witness is listed on a Party's pretrial witness list and has not been previously deposed in this MDL, that Party shall make the witness available for deposition as soon as is reasonably practicable and at least one month before trial.
2. To the extent any Party submits a declaration, affidavit, or other witness statement in support of or in opposition to a summary judgment motion or other motion in the above-captioned action, and the declarant, affiant, or witness has not yet been deposed in this MDL, that Party shall make that declarant, affiant, or witness available for deposition at least two weeks before any responsive pleading is due, or if there is no responsive pleading, then at least two weeks before a hearing is scheduled on the motion, or if no hearing is scheduled on the motion, then no more than three weeks after the declaration, affidavit, or witness statement is submitted (or at such other time to which the parties may agree).
3. The Parties shall abide by the Special Master's Order re: Deposition Protocol, MDL Dkt. No. 1546 in scheduling depositions and determining appropriate deposition locations.
4. Paragraphs 1 and 2 shall apply only to declarants, affiants or witnesses currently or formerly employed by a Party.
5. If a declarant, affiant or witness is neither a current or former employee of the Party, then the Party agrees: (i) to use best efforts to secure the cooperation of the prospective witness; (ii) to provide any known contact information for the prospective witness; (iii) to cooperate on dates and location; and (iv) not to object

1 to a deposition pursuant to a Rule 45 subpoena on the grounds that discovery has
2 closed.

3 Respectfully submitted,

4
5 Dated: May 17, 2013

DAVIS WRIGHT TREMAINE LLP

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7 By /s/Sanjay Nangia
Allison A. Davis
8 Sanjay Nangia
Nick S. Verwolf, *Pro Hac Vice*

9 Attorneys for Defendant
10 Sanyo Consumer Electronics Co., Ltd.

11 Also filed on behalf of Defendants AU Optronics
12 Corporation; AU Optronics Corporation America; Chi Mei
13 Optoelectronics Corporation (n/k/a Chimei Innolux
14 Corporation); Chi Mei Optoelectronics USA, Inc., and
CMO Japan Co., Ltd.; Chunghwa Picture Tubes, Ltd.;
15 Epson Imaging Devices Corporation; Epson Electronics
16 America, Inc.; HannStar Display Corporation; Hitachi,
17 Ltd.; Hitachi Displays, Ltd.; Hitachi Electronic Devices
(USA), Inc.; LG Display Co., Ltd.; LG Display America,
18 Inc.; Mitsui & Co. (U.S.A.), Inc.; Mitsui & Co. (Taiwan),
19 Ltd.; NEC Corporation; NEC Electronics America, Inc.;
NEC LCD Technologies, Ltd.; Sharp Corporation; Sharp
Electronics Corporation; Toshiba Corporation; Toshiba
America Electronic Components, Inc.; Toshiba America
Information Systems, Inc.; and Toshiba Mobile Display
Co., Ltd.

20 DATED: May 17, 2013

BOIES, SCHILLER & FLEXNER

21
22 By: /s/ Christopher V. Fenlon
23 William A. Isaacson
Philip J. Iovieno
24 Christopher V. Fenlon

25 Attorneys for Plaintiff
26 Interbond Corporation of America (Brandsmart)

27 Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this
28 document has been obtained from each of the above signatories.

IT IS SO ORDERED.

Dated: 05/23/2013



Hon. Susan Illston
United States District Judge